

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

In RE: Clay A. Moore  
And Gail A. Moore

Chapter 7

Debtors

BK No. 17-11368 MSH

**JOINT MOTION TO CONTINUE HEARING ON DEBTORS' MOTION TO CONVERT  
CASE TO CHAPTER 13; DEBTORS' MOTION TO AMEND SCHEUDLE C,  
APPLICATION OF DONALD LASSMAN, CHAPTER 7 TRUSTEE TO EMPLOY REAL  
ESTATE BROKER, DEBTORS' MOTION TO AMEND SCHEDULE A, AND  
DEBTORS' MOTION TO COMPEL TRUSTEE TO ABANDON REAL PROPERTY**

Now come the parties, the Debtors, Clay A. Moore and Gail A. Moore, and Donald R. Lassman, Chapter 7 Trustee, by and through their respective counsel, and humbly request that this Honorable Court continue the hearings on Debtors' Motion to Convert Chapter 7 Case to Chapter 13, Debtors' Motion to Amend Schedule C, Application of Donald Lassman, Chapter 7 trustee to Employ Real Estate Broker, Debtor's Motion to Amend Schedule A, and Debtor's Motion to Compel Trustee to Abandon Real property scheduled for Tuesday, July 25, 2017 for two weeks, to Tuesday, August 8, 2017. As grounds therefore, the Debtors' attorney has a scheduling conflict with a matter in Rhode Island, that was expected to be a uncontested matter, that has now become contested. In addition, in light of Debtor's Motion filed on July 20, 2017, the continuation will allow for response/objection from Trustee's counsel. As such, the parties respectfully request a continuance to August 8, 2017.

WHEREFORE, the parties respectfully request that this Honorable Court continue the hearings on this matter to August 8, 2017, or a date convenient to this Honorable Court.

Dated: 07/21/2017

Respectfully Submitted:

Clay and Gail Moore  
By their attorney,

Donald Lassman  
Chapter 7 Trustee,  
By his attorney,  
Alex F. Mattera, Esq.

/s/Felicia A. Manni-Paquette  
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### **CERTIFICATE OF SERVICE**

I, Felicia A. Manni-Paquette, Esq., do hereby certify that on July 21, 2017 I electronically filed with the Clerk of the Bankruptcy Court the above Motion to Continue Hearings in the within matter, and served same in the following manner upon the interested parties:

E-Mail Service: via the Court's CM/ECF system which sent notification of such filing to the following:

John Fitzgerald, Asst. U.S. Trustee  
Donald Lassman, Chapter 7 Trustee  
Alex F. Mattera, on behalf of Donald Lassman, Chapter 7 Trustee  
PRA Receivables Mg

And by regular mail, postage prepaid, to creditors listed on attached mailing matrix.

/s/ Felicia A. Manni-Paquette  
Felicia A. Manni-Paquette, Esq.

